



DCP Operating Company
3026 4th Avenue
Greeley, CO 80631

July 27, 2021

NSPS and MACT Coordinator
Colorado Department of Public Health and Environment
Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

RE: Notification of Compliance Status for MACT Subpart HH
DCP Operating Company, LP
O'Connor Plant
CDPHE APCD Permit No. 11WE1481 Issuance 7
Facility AIRS ID 123-9012

Dear Sir/Madam,

DCP Operating Company, LP (DCP) operates the O'Connor Plant. O'Connor Gas Plant, which is authorized by Permit No. 11WE1481, Issuance 7 (issued on May 26, 2021). The O'Connor Plant is a major source with respect to 40 CFR Part 63 for hazardous air pollutants (HAP) and is subject to major source provisions under 40 CFR Part 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (MACT HH).

Per §63.775(b)(5), DCP is required to submit periodic reports under MACT HH for the O'Connor Plant. These reports are due semi-annually, 60 calendar days after the end of the reporting period. The first report must be submitted no later than 240 days after the date the Notification of Compliance Status Report (NOCS) is due and shall cover the 6-month period beginning on the date the (NOCS) is due (§63.775(e)(1)).

The reporting period for this periodic report is from January 1 – June 30, 2021.

Affected equipment under MACT HH includes the plant flare used for blowdowns, maintenance and malfunction event (FLARE-2, AIRS ID 010) and the 230 MMscf/day triethylene glycol (TEG) natural gas dehydration unit (D-01, AIRS ID 018).

Details of the facility (inclusive of facility address and mailing address) contact information are given in the table below:

Company and Facility Information

Name of Company		Facility Name	
DCP Operating Company, LP		O'Connor Plant	
Facility Location: (Street)	County	State	Zip
Section 31, T5N, R64W	Weld	CO	
Mailing Address (if different):	City	State	Zip
370 17 th Street, Suite 2500	Denver	CO	80202
Contact Person	Phone	Email	
Patricia Grajeda De Babb	(970) 378-6361	PGrajedaDeBabb@dcpmidstream.com	

Specific information required in the periodic report for MACT HH is included below. Note that only relevant information to the facility and equipment is detailed.

SECTION 1. §63.775(e) INFORMATION

§63.775(e) Periodic Reports. An owner or operator of a major source shall prepare Periodic Reports in accordance with paragraphs (e) (1) and (2) of this section and submit them to the Administrator.

§63.775(e)(1) An owner or operator shall submit Periodic Reports semiannually beginning 60 calendar days after the end of the applicable reporting period. The first report shall be submitted no later than 240 days after the date the Notification of Compliance Status Report is due and shall cover the 6-month period beginning on the date the Notification of Compliance Status Report is due. This submittal serves to satisfy this requirement. The reporting period for this periodic report is from January 1 – June 30, 2021.

§63.775(e)(2) The owner or operator shall include the information specified in paragraphs (e)(2)(i) through (ix) of this section, as applicable.

§63.775(e)(2)(i) The information required under §63.10(e)(3). For the purposes of this subpart and the information required under §63.10(e)(3), excursions (as defined in §63.773(d)(6)) shall be considered excess emissions.

Information required in §63.10(e)(3) is provided below in Section 2 of this report.

§63.775(e)(2)(ii) A description of all excursions as defined in §63.773(d)(6) of this subpart that have occurred during the 6-month reporting period.

Only the excursion defined in §63.773(d)(6)(iv) is applicable to this source.

§63.775(e)(2)(ii)(D) For each excursion caused by the lack of monitoring data, as specified in §63.773(d)(6)(iv), the report must include the date and duration of the period when the monitoring data were not collected and the reason why the data were not collected. No excursions caused by lack of monitoring data (as specified in §63.773(d)(6)(iv)) occurred during the reporting period.

§63.775(e)(2)(iii) For each inspection conducted in accordance with §63.773(c) during which a leak or defect is detected, the records specified in §63.774(b)(7) must be included in the next Periodic Report. All the closed vent system initial inspections were performed by October 21, 2020. No leaks or defects were detected during the close vent system inspection.

§63.775(e)(2)(iv) For each owner or operator subject to the provisions specified in §63.769, the owner or operator shall comply with the reporting requirements specified in 40 CFR 61.247, except that the Periodic Reports shall be submitted on the schedule specified in paragraph (e)(1) of this section.

This equipment is not in VHAP service and is therefore not subject to §63.769.

§63.775(e)(2)(v) For each closed-vent system with a bypass line subject to §63.771(c)(3)(i)(A), records required under §63.774(b)(4)(iii) of all periods when the vent stream is diverted from the control device through a bypass line. For each closed-vent system with a bypass line subject to §63.771(c)(3)(i)(B), records required under §63.774(b)(4)(iv) of all periods in which the seal mechanism is broken, the

bypass valve position has changed, or the key to unlock the bypass line valve was checked out. The closed-vent system is not equipped with a bypass line; therefore, this is not applicable.

§63.775(e)(2)(vi) If an owner or operator elects to comply with §63.765(b)(1)(ii), the records required under §63.774(c)(3).The unit at the O'Connor Plant is not a large dehydration unit, therefore §63.774(c)(3) is not applicable.

§63.775(e)(2)(vii) The information in paragraphs (e)(2)(vii) (A) and (B) of this section shall be stated in the Periodic Report, when applicable.

§63.775(e)(2)(vii)(A) No excursions.

§63.775(e)(2)(vii)(B) No continuous monitoring system has been inoperative, out of control, repaired, or adjusted.

No excursions occurred during the reporting period, and no continuous monitoring system has been inoperative, out of control, repaired, or adjusted.

§63.775(e)(2)(viii) Any change in compliance methods as specified in §63.772(f).No changes in compliance methods have occurred during the reporting period

§63.775(e)(2)(ix) If the owner or operator elects to comply with §63.765(c)(2), the records required under §63.774(b)(11).The glycol dehydration unit at the O'Connor Plant is a small dehydration unit, therefore this section does not apply.

§63.775(e)(2)(x) For flares, the records specified in §63.774(e)(3).

§63.774(e)(3) All hourly records and other recorded periods when the pilot flame is absent. There were no periods during the reporting period in which the pilot flame was absent.

§63.775(e)(2)(xi) The results of any periodic test as required in §63.772(e)(3) conducted during the reporting period. Periodic testing is not required for this source.

§63.775(e)(2)(xii) For each carbon adsorber used to meet the control device requirements of §63.771(d)(1), records of each carbon replacement that occurred during the reporting period. A carbon adsorber is not used to meet the control device requirements of §63.771(d)(1); therefore, this section does not apply.

§63.775(e)(2)(xiii) For combustion control device inspections conducted in accordance with §63.773(b) the records specified in §63.774(i). The control device's model was not tested under §63.772(h); therefore, this section does not apply.

§63.775(e)(2)(xiv) Certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The responsible official certification, including the above statement, is provided in Attachment A to this report.

§63.775(b)(6) If there was a malfunction during the reporting period, the Periodic Report specified in paragraph (e) of this section shall include the number, duration, and a brief description for each type of malfunction which

occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.764(j), including actions taken to correct a malfunction. There were no malfunctions that caused or may have caused an exceedance of an applicable emission limitation during the reporting period.

SECTION 2. §63.10(e)(3) INFORMATION

§63.10(e)(3) *Excess emissions and continuous monitoring system performance report and summary report.*

§63.10(e)(3)(i) *Excess emissions and parameter monitoring exceedances are defined in relevant standards. The owner or operator of an affected source required to install a CMS by a relevant standard shall submit an excess emissions and continuous monitoring system performance report and/or a summary report to the Administrator semiannually, except when—*

§63.10(e)(3)(i)(A) *More frequent reporting is specifically required by a relevant standard; More frequent reporting is not specifically required by MACT HH. Therefore, reports under this requirement will be submitted semiannually.*

§63.10(e)(3)(i)(B) *The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or The Administrator has not determined that more frequent reporting is required for this source. Therefore, reports under this requirement will be submitted semiannually.*

§63.10(e)(3)(i)(C) *[Reserved]*

§63.10(e)(3)(i)(D) *The affected source is complying with the Performance Track Provisions of §63.16, which allows less frequent reporting. The O'Connor Plant is not complying with the Performance Track Provisions of §63.16; therefore, reports will be submitted semiannually.*

§63.10(e)(3)(ii) *Request to reduce frequency of excess emissions and continuous monitoring system performance reports. Notwithstanding the frequency of reporting requirements specified in paragraph (e)(3)(i) of this section, an owner or operator who is required by a relevant standard to submit excess emissions and continuous monitoring system performance (and summary) reports on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual if the following conditions are met:*

§63.10(e)(3)(ii)(A) *For 1 full year (e.g., 4 quarterly or 12 monthly reporting periods) the affected source's excess emissions and continuous monitoring system performance reports continually demonstrate that the source is in compliance with the relevant standard;*

§63.10(e)(3)(ii)(B) *The owner or operator continues to comply with all recordkeeping and monitoring requirements specified in this subpart and the relevant standard; and*

§63.10(e)(3)(ii)(C) *The Administrator does not object to a reduced frequency of reporting for the affected source, as provided in paragraph (e)(3)(iii) of this section.*

§63.10(e)(3)(iii) *The frequency of reporting of excess emissions and continuous monitoring system performance (and summary) reports required to comply with a relevant standard may be reduced only*

after the owner or operator notifies the Administrator in writing of his or her intention to make such a change and the Administrator does not object to the intended change. In deciding whether to approve a reduced frequency of reporting, the Administrator may review information concerning the source's entire previous performance history during the 5-year recordkeeping period prior to the intended change, including performance test results, monitoring data, and evaluations of an owner or operator's conformance with operation and maintenance requirements. Such information may be used by the Administrator to make a judgment about the source's potential for noncompliance in the future. If the Administrator disapproves the owner or operator's request to reduce the frequency of reporting, the Administrator will notify the owner or operator in writing within 45 days after receiving notice of the owner or operator's intention. The notification from the Administrator to the owner or operator will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.

§63.10(e)(3)(iv) As soon as CMS data indicate that the source is not in compliance with any emission limitation or operating parameter specified in the relevant standard, the frequency of reporting shall revert to the frequency specified in the relevant standard, and the owner or operator shall submit an excess emissions and continuous monitoring system performance (and summary) report for the noncomplying emission points at the next appropriate reporting period following the noncomplying event. After demonstrating ongoing compliance with the relevant standard for another full year, the owner or operator may again request approval from the Administrator to reduce the frequency of reporting for that standard, as provided for in paragraphs (e)(3)(ii) and (e)(3)(iii) of this section.

The O'Connor Plant has not submitted a request to reduce reporting frequency; therefore, reports will be submitted semiannually.

§63.10(e)(3)(v) Content and submittal dates for excess emissions and monitoring system performance reports. All excess emissions and monitoring system performance reports and all summary reports, if required, shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. Written reports of excess emissions or exceedances of process or control system parameters shall include all the information required in paragraphs (c)(5) through (c)(13) of this section, in §§63.8(c)(7) and 63.8(c)(8), and in the relevant standard, and they shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report. When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

Per paragraph (e)(3)(vii) If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator.

The total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report is being submitted. No excess emissions or exceedances of a parameter have occurred, nor has a CMS been inoperative, out of control, repaired, or adjusted.

§63.10(e)(3)(vi) Summary report. As required under paragraphs (e)(3)(vii) and (e)(3)(viii) of this section, one summary report shall be submitted for the hazardous air pollutants monitored at each affected source (unless the relevant standard specifies that more than one summary report is required, e.g., one summary report for each hazardous air pollutant monitored). The summary report shall be entitled "Summary Report—Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and shall contain the following information:

§63.10(e)(3)(vi)(A) The company name and address of the affected source;

Company Name: DCP Operating Company, LP

Source Location: Section 31, T5N, R64W

§63.10(e)(3)(vi)(B) An identification of each hazardous air pollutant monitored at the affected source; As required by MACT HH, emissions of benzene, toluene, ethylene, and xylenes from the dehydration unit are controlled.

§63.10(e)(3)(vi)(C) The beginning and ending dates of the reporting period;

The reporting period for this report is January 1, 2021 – June 30, 2021.

§63.10(e)(3)(vi)(D) A brief description of the process units; The affected process unit is a TEG dehydration unit (D-1), which treats up to 230 MMscfd of wet natural gas and is equipped with a flash tank and glycol flash tank. The still vent of the dehydrator is routed to an air-cooled condenser and then to a VRU that recycles the emissions back to the plant inlet.

§63.10(e)(3)(vi)(E) The emission and operating parameter limitations specified in the relevant standard(s);

MACT HH requires the flare to be compliant with §63.11(b), which requires that the flare be:

- Designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- Operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.
- Used only with the net heating value of the gas being combusted at 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or with the net heating value of the gas being combusted at 7.45 MJ/scm (200 Btu/scf) or greater if the flares is non-assisted.
- Designed and operated with an exit velocity less than the velocity V_{max} (for air-assisted flares)

Furthermore, MACT HH requires that the flare be monitored with a heat sensing monitoring device equipped with a continuous recorder that indicates the continuous ignition of the pilot flame. The flare at the O'Connor Plant complies with §63.11(b) and is equipped with a thermocouple to continuously monitor and record the on/off status of the pilot flame.

§63.10(e)(3)(vi)(F) The monitoring equipment manufacturer(s) and model number(s); The thermocouple is a retractable thermocouple model number 3K30-U-"L"-4RS/4RS-TT(IL)18 manufactured by Thermo Sensors Corp .

§63.10(e)(3)(vi)(G) The date of the latest CMS certification or audit; The latest performance check/audit for the thermocouple and data recorder was conducted on June 2021.

§63.10(e)(3)(vi)(H) The total operating time of the affected source during the reporting period;

The dehydration unit operated 4219.91 hours during the reporting period.

§63.10(e)(3)(vi)(I) An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes; There were no excess emissions during the reporting period.

§63.10(e)(3)(vi)(J) A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, nonmonitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes; There no periods of CMS downtime during the reporting period.

§63.10(e)(3)(vi)(K) A description of any changes in CMS, processes, or controls since the last reporting period; There were no changes in CMS, processes, or controls since the last reporting period.

§63.10(e)(3)(vi)(L) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and

Attachment A to this report contains the name, title, and signature of the responsible official.

§63.10(e)(3)(vi)(M) The date of the report.

Report Date: July 27, 2021.

§63.10(e)(3)(vii) If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator.

§63.10(e)(3)(viii) If the total duration of excess emissions or process or control system parameter exceedances for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

As described above, the total duration of excess emissions or process or control system parameter exceedances for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period; therefore, only the summary report is being submitted. No excess emissions or exceedances of a parameter have occurred, nor has a CMS been inoperative, out of control, repaired, or adjusted.

Should you have questions regarding this report or require additional information, please contact Keith Warren at 303.605.1936 or kwarren@dcpmidstream.com.

Sincerely,
DCP Operating Company, LP

A handwritten signature in blue ink, appearing to be 'K. Warren', followed by a long horizontal line extending to the right.

Keith Warren, P.E.
Environmental Manager
Northern Business Unit

cc: Environmental Protection Agency (EPA) Region 8

Attachment A

Responsible Official Certification

MACT HH Periodic Report

Certification by Responsible official

Based on the information and belief formed after reasonable inquiry, to the best of my knowledge I believe the statements and information in this document are true, accurate, and complete.

Sincerely,

A handwritten signature in blue ink, appearing to read 'C. Job', with a long horizontal flourish extending to the right.

Charles A. Job
DCP Operating Company, LP
General Manager, North Area Operations